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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:
Yvette Yanzon Heffern
Debtor.

Case No. 18-26279
Honorable Carol A. Doyle
Chapter 13

NOTICE OF MOTION

To:

Ben L. Schneider
Schneider & Stone
8424 Skokie Blvd.
Suite 200
Skokie, IL 60077
Via Court Electronic
Notification

Tom Vaughn
200 S. Michigan Ave. 13th Floor
Chicago, IL 60604
Via Court Electronic Notification

PLEASE TAKE NOTICE that on the 12th day of February 2019 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Carol A. Doyle in Courtroom 742 in the United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, or before any other Bankruptcy Judge who may be presiding in said Judge's place and stead, and shall then and there move the Court for the entry of an order in accordance with the attached motion at which time you may appear if you so desire.

/s/ James M. Philbrick

CERTIFICATE OF SERVICE

I, James M. Philbrick, an attorney, certify that I personally served the above and foregoing notice and motion on the above parties by Court Electronic Notification and by depositing the same in the U.S. Mail on the 31st day of January, 2019, before the hour of 5:00 p.m. from the U.S. Post Office, Mundelein, Illinois 60060.

/s/ James M. Philbrick

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Debtor.

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Chapter 13

MOTION FOR ENTRY OF AN AGREED ORDER

NOW COMES Ally Financial, by and through its attorney, JAMES M. PHILBRICK, of THE LAW OFFICES OF JAMES M. PHILBRICK, and as and for its Motion for entry of an agreed order, states as follows:

1. That Ally Financial is a creditor-claimant of the Debtor.
2. That on September 18, 2018, the Debtor filed a voluntary petition under Chapter 13 of Title 11 of the United States Code.
5. That Ally Financial and the Debtor have agreed to the entry of the attached agreed Order.
6. That for the reasons stated herein, Ally Financial requests entry of the attached agreed order.

WHEREFORE, Ally Financial prays this Honorable Court for the entry of the attached agreed order; and for such other and further relief as the Court may deem just and proper.

Ally Financial

By: /s/ James M. Philbrick

One of its Attorneys

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